

Via ECFS

December 13, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Written Ex Parte Presentation - ET Docket Nos. 09-191 and WC Docket No. 07-52*

Dear Ms. Dortch:

Our company, Communication Specialists (Comspeco.net), provides Fixed Wireless broadband service in Southeastern North Carolina. I am writing you today because I fear that the FCC and the Federal Government may be losing sight of the importance of small businesses and grassroots entrepreneurship when considering its rules pertaining to Net Neutrality.

We are a small “mom and pop” wireless communications company that was started by my parents in 1954 as a mobile radio communications provider for various public safety agencies. We have 16 employees. In 2000, we began to fill a local need to provide affordable wireless Internet to the businesses and residents in a three county area here in Southeastern North Carolina. We depend completely on unlicensed spectrum to deliver Internet services and have spent the last 10 years slowly building out our wireless network using devices authorized under Part 15 of the FCC rules.

I am writing today to ask you, as you consider the adoption of certain Network Neutrality rules, to please be aware of the negative repercussions these rules will have on our ability to continue to provide fixed wireless Internet in our area. I have read the pending rules grouping my small business and its wireless broadband services with the traditional wired services industry, which, in my area at least, is dominated by a few huge international communications corporations. As a small community-oriented business, we may not be able to survive if we are subject to these rules. Network Neutrality rules imposed on Fixed Wireless broadband providers should be no more rigid than the rules applied to mobile wireless broadband providers. Those services are much more closely related to our services. Because of the very nature of fixed wireless technology, we can only survive in an atmosphere of more relaxed rules regarding net neutrality.

We are members of WISPA, founded by, and consisting of other small wireless companies. Ms. Dortch, we stand united on this issue, as I am sure you are aware after having read WISPA's Ex Parte presentation filed on December 10, 2010. We believe that what may be “reasonable” network management practices for the AT&Ts and Time Warner's of the world will be devastating to the fixed wireless industry because they do not account for the unique obstacles faced by small businesses with congested networks, bandwidth constraints, access limitations and a lack of investment capital.

Like Communication Specialists network, the majority of fixed wireless Internet networks have been funded privately and grown organically with our primary markets being areas where high-speed Internet is not available. We cannot afford to pass along the additional costs of transport to our already underserved customers. A primary goal of the National Broadband Plan is to ensure that all Americans receive affordable broadband service. If the proposed rules are approved to include small fixed wireless companies, this goal will be much more difficult to achieve.

Thank you Ms. Dortch for your consideration,

Kelley McNeill
VP, Internet Services